

Final Draft Industrial General Permit Overview

**State Water Resources Control Board
Division of Water Quality
Storm Water Program**

Goals

- Performance Based Model
- Improved Data Quality
- Incentives and Flexibility
- Reduce Compliance Costs

Industrial General Permit Timeline

1991	Board adopted first industrial general permit
1997	Board adopted second industrial general permit
2003	Board Hearing on 1 st draft of industrial general permit
2005	Board Hearing on 2 nd draft permit
2005	Board convened a Blue Ribbon Panel of Experts
2006	Blue Ribbon Panel of Experts completed report on Numeric Effluent Limits
2006-2009	Board delayed development of 3 rd draft permit (SMARTS, CGP)
2011	Board Hearing on 3 rd draft permit
2012	Board Hearing on 4 th draft permit
2013	August 21, 2013 - Board Hearing on final draft of the industrial general permit

Significant Changes from Previous Draft Permit

Requirements for Receiving Permit Coverage, Section II

- The Draft Permit clarifies that the Discharger may appoint a “Duly Authorized Representative” for submittal of all documents other than Permit Registration Documents

Requirements for Receiving Permit Coverage, Section II

- Language added allowing Dischargers to redact trade secrets for required electronic submittals in SMARTS
- Un-redacted paper copies due within 30 days to the Regional Water Board

Best Management Practices (BMPs)

Section X.H

- Minimum BMPs have been revised and Advanced BMPs added for consistency with U.S. EPA's measures

Total Maximum Daily Loads (TMDLs)

Section VIII

- Implementation requirements to be included during future amendment of adopted permit (2 years after the adoption)
- Dischargers only required to comply with TMDLs after the adopted permit is amended

Discharges Subject to 2012 California Ocean Plan Amendments, Section VIII.A

- Applies only to Dischargers with direct outfalls to the ocean
- January 1, 2015 – A monitoring plan must be developed and implemented to obtain coverage under this permit

Industrial Storm Water Practitioner (QISP), Section XI

- Only one type of QISP
- Dischargers with Level 1 are required to have a QISP
- Compliance Group Leaders are required to be a QISP

Training Qualifications for California licensed professional engineers and geologists

- The term “Licensee” removed
- Certain California-licensed professional engineers and geologists are eligible to complete self-guided QISP training only
- Must register as a QISP in SMARTS

Visual Observation Monitoring Requirements, Section XI.A

- Monthly visual observation now includes quarterly authorized and unauthorized non-storm water discharges
- Pre-storm visual observations not required
- Storm water discharge visual observations only required during sampling

Sampling and Analysis Monitoring Requirements, Section XI.B

- Sampling frequency changed from quarterly to twice in first half of year (July 1st – December 31st) and twice in second half of year (January 1st – June 30th)

Sampling and Analysis Monitoring Requirements, Section XI.B

- Revised definition of Qualifying Storm Event (QSE)
 - Rain gauge not required
 - "Dry weather" interval decreased from 72 hours to 48 hours

Sampling and Analysis Monitoring Requirements, Section XI.B

- Average Numeric Action Level (NAL) for pH removed
- Option for most Dischargers to initially screen for pH using litmus paper or test kits

Sampling and Analysis Monitoring Requirements, Section XI.B

- Representative Sampling
Reduction replaces Sample
Location Reduction
- Representative Sampling
Reduction justification required in
Monitoring Implementation Plan

Sampling and Analysis Monitoring Requirements, Section XI.B

- Qualified Combined Samples justification is now required in the Monitoring Implementation Plan
- Sampling Frequency Reduction eligibility decreased from 8 to 4 consecutive sampled QSEs below NALs
- Frequency reduction is 2 samples per year

Exceedance Response Actions (ERAs)

Section XII

- NALs applicable on permit effective date
- Status changes on July 1st of each year
- Level 1 ERA Report date extended to January 1st (previously required 60 days after status change)

Exceedance Response Actions (ERAs)

Section XII

- Added Level 2 ERA Action Plan
(due January 1st)
- Level 2 ERA Technical Report
(due January 1st of next year)
- Level 2 ERA Demonstrations
combined into one Level 2 ERA
Technical Report

Exceedance Response Actions (ERAs)

Section XII

- BAT/BCT Compliance
Demonstration is now the
Industrial Activity BMPs Technical
Report (exceed or not exceed
future NALs)
- Discharger can submit Level 2 ERA
Action Plans and Technical
Reports any time

Exceedance Response Actions (ERAs)

Section XII

- Dischargers with Level 2 status eligible for Baseline status if:
 - Industrial Activity BMPs Technical Report is submitted
 - and
 - Sampling from 4 consecutive quarters demonstrates elimination of future NAL exceedances

Exceedance Response Actions (ERAs)

Section XII

- BMP Implementation Extension
Request replaced by Level 2 ERA
Implementation Extension
(6 months automatic extension)

Compliance Groups and Compliance Group Leaders Section XIV

- One Compliance Group type
- Compliance Group leaders must prepare site-specific Level 2 ERA Technical Reports (consolidated Level 2 reports were previously proposed)
- Reduction in sampling - two QSEs per year
- Sampling Frequency Reduction (SFR) - one QSE per year

Other Changes

- Annual reporting consists of a single compliance checklist
- QISP not required for preparation of initial No Exposure Certification or annual recertification
- Added Special Conditions (Part C) Requirements for Dischargers Claiming “No Discharge” Option in Notice of Non Applicability (No Discharge and hydrologically disconnected)

Questions?

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